

VERNON P. CLEM and	:	IN THE
MARGARET C. CLEM	:	
	:	CIRCUIT COURT
Plaintiffs	:	
	:	FOR
VS.	:	
	:	FREDERICK COUNTY, MARYLAND
ALL PERSONS HAVING OR CLAIMING:	:	
TO HAVE ANY INTEREST IN THE	:	CIVIL NO. 18452
PROPERTY HEREIN DESCRIBED	:	
	:	
Defendant	:	

COMPLAINT TO QUIET TITLE

Plaintiffs, Vernon P. Clem and Margaret C. Clem, by their attorney, Tod P. Salisbury, state that:

(1) Plaintiffs are adult citizens of the United States who reside in Frederick County, Maryland, and are the fee simple owners of a parcel of land on Hemler Road in Emmitsburg Election District, Frederick County, Maryland, by virtue of a Deed dated August 2, 1968 from David E. Warthen and Doris M. Warthen to Plaintiffs recorded among the Land Records of Frederick County, Maryland, in Book 789, page 94, a copy of which Deed is attached hereto marked Exhibit A and incorporated herein by reference.

(2) That said parcel is more particularly described as: All that piece or parcel of land situate on the North side of Hemler Road, in Emmitsburg Election District, Frederick County, Maryland, beginning for the same at an iron tee bar with Registered Land Surveyor's Cap No. 2046 now set in the ground, (hereinafter referred to as a standard marker) on and at a distance of 291.27 feet along the fourth line of the third parcel of land conveyed by Dorothy E. Keyes to James N. Wivel and wife by deed dated November 22, 1950 and recorded among the Land Records of Frederick County in Liber 489, folio 199; thence running and binding in part on said fourth line, (1) North 64 degrees 30' 21" West 141.62 feet to a standard marker; thence for a line of division across said land, (2) South 36 degrees 28' 59" West 340.66 feet to a point on the center line of Hemler Road; thence running and binding on said center line the following two courses and distances, (3) South 57 degrees 50' 04" East 70.35 feet to a point on centerline, (4) South 62 degrees 07' 11" East 69.65 feet to a point on centerline; thence for a line of division, (5) North 36 degrees 28' 59" East 351.94 feet to the place of beginning, containing 1.109 acres, more or less.

(3) Possession of said subject property by plaintiff and his predecessors in title has been actual, open, notorious, and visible, exclusive hostile, and continuous for a period in excess of 20 years prior to the filing of this Complaint.